

SDNY (Rev. 10/2006) Pro Hac Vice Motion to Admit Counsel

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Allied International Union, an  
unincorporated labor Plaintiff,  
organization,

08 cv 3357 (AKH)

MOTION TO ADMIT COUNSEL

PRO HAC VICE

- against -  
Service Employees  
International Union Defendant.  
Local 32B - 32J et al.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the  
Southern and Eastern Districts of New York, I, Larry Engelstein a member in good standing of  
the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Todd E. Edelman  
Firm Name: Bredhoff & Kaiser, P.L.L.C.  
Address: 805 Fifteenth Street, NW, Suite 1000  
City/State/Zip: Washington, DC 20005  
Phone Number: (202) 842-2600  
Fax Number: (202) 842-1888

is a member in good standing of the Bar of the States of

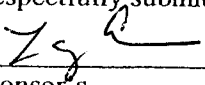
District of Columbia and Illinois

There are no pending disciplinary proceeding against Todd E. Edelman  
in any State or Federal court.

Dated: May 15, 2008

City, State: New York, NY

Respectfully submitted,

  
Sponsor's

SDNY Bar 0131

Firm Name: Service Employees International Union, Local 32BJ

Address: 101 Avenue of the Americas 22nd Floor

City/State/Zip: New York, New York 10013

Phone Number: 212 - 388-2128

Fax Number: 212 - 388-3660

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Allied International Union,

Plaintiffs,

v.

Service Employees International Union  
Local 32BJ, Michael Fishman, Andrew  
Friedman, Niel Diaz, Service Employees  
International Union Local 1877, and  
Service Employees International Union,

Defendants.

Case No.: 08 cv 03357 (AKH)

**DECLARATION OF  
LARRY ENGELSTEIN  
IN SUPPORT OF MOTION TO  
ADMIT COUNSEL PRO HAC VICE**

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Larry Engelstein declares as follows:

1. I am General Counsel for Service Employees International Union, Local 32BJ, counsel for Defendants Service Employees International Union Local 32BJ, Michael Fishman, Andrew Friedman, Niel Diaz, and Service Employees International Union Local 1877 in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit Todd E. Edelman as counsel pro hac vice to represent Defendants Service Employees International Union Local 32BJ, Michael Fishman, Andrew Friedman, Niel Diaz, and Service Employees International Union Local 1877 in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on November 30<sup>th</sup> of 1999. I am also admitted to the Bar of this Court and am in good standing with this court.
3. Mr. Edelman is a member at Bredhoff & Kaiser P.L.L.C., in Washington, D.C..

4. I believe Mr. Edelman to be a skilled attorney, a person of integrity, experienced in Federal practice and familiar with the Federal Rules of Procedure.
5. Accordingly, I am pleased to move the admission of Todd E. Edelman, pro hac vice.
6. I respectfully submit a proposed order granting the admission of Todd E. Edelman, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Todd E. Edelman pro hac vice, to represent Service Employees International Union Local 32BJ, Michael Fishman, Andrew Friedman, Niel Diaz, Service Employees International Union Local 1877 in the above captioned matter, be granted.

I declare under penalty of perjury that the foregoing is true and correct and was executed this 15<sup>th</sup> day of May, 2008, at New York, New York.

  
\_\_\_\_\_  
Larry Engelstein (SS 0131)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Allied International Union, an  
unincorporated labor Plaintiff,  
organization,

08 cv 3357 (AKH)

- against -  
Service Employees Defendant.  
International Union  
Local 32B-32J et al.

ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION

Upon the motion of Larry Engelstein attorney for Defendants, please see attached,  
and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Todd E. Edelman

Firm Name: Bredhoff & Kaiser, P.L.L.C.

Address: 805 Fifteenth Street, NW, Suite 1000

City/State/Zip: Washington, DC 20005

Telephone/Fax: (202) 842 - 2600

Email Address: tedelman@bredhoff.com

is admitted to practice pro hac vice as counsel for please see attached in the above  
captioned case in the United States District Court for the Southern District of New York. All attorneys  
appearing before this Court are subject to the Local Rules of this Court, including the Rules governing  
discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall  
immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice  
fee to the Clerk of Court.

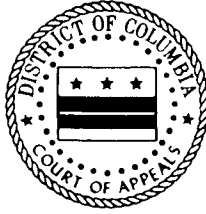
Dated:  
City, State:

United States District/Magistrate Judge

**Attachment to Order for Admission Pro Hac Vice on Written Motion**

Parties represented by Larry Engelstein and Todd E. Edelman:

- 1) Service Employees International Union, Local 32BJ
- 2) Michael Fishman
- 3) Andrew Friedman
- 4) Niel Diaz
- 5) Service Employees International Union, Local 1877



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

TODD E. EDELMAN

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was on the 7<sup>TH</sup> day of JULY, 1995  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on May 12,  
2008.

GARLAND PINKSTON, JR., CLERK

By: M. Charles  
Deputy Clerk

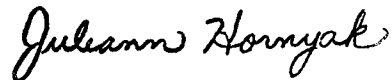
## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Todd Eric Edelman

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 10, 1994 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Tuesday, May 13, 2008.



Clerk

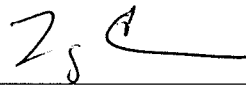
Todd Eric Edelman is currently registered as an inactive attorney pursuant to Supreme Court Rule 756(a)(5), and "shall no longer be eligible to practice law" or hold himself out as being authorized to practice law in Illinois.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion to Admit Counsel Pro Hac Vice was served, via First Class Mail, on this 16 day of May, 2008, upon the following:

Kevin Michael Hart  
Stark & Stark, P.C.  
P.O. Box 5315  
Princeton, NJ 08543

Service Employees International Union  
1800 Massachusetts Avenue, NW  
Washington, DC 20036



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Larry Engelstein, SS 0131  
Service Employees International Union,  
Local 32BJ  
101 Avenue of the Americas, 22<sup>nd</sup> Floor  
New York, N.Y. 10013